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LETTER AND COMMENTS FROM U S EPA REGION III REGARDING DRAFT REVISED
SAMPLING AND ANALYSIS PLAN REMEDIAL INVESTIGATION SITE 31 NWS YORKTOWN
VA
9/4/2012
U S EPA REGION III



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

September 4, 2012

Mr. James Gravette
Naval Facilities Engineering Command (Navy)
1510 Gilbert Avenue
Building N-26, Room 3300
Norfolk, VA 23511-3095

Re: Draft Revised Sampling and analysis Plan
Site 31 Remedial Investigation
Naval Weapons Station Yorktown
Yorktown, Virginia

Dear Mr. Gravette:

The United States Environmental Protection Agency Region III (USEPA) has reviewed Navy's Draft Revised Sampling and Analysis Plan; Site 31 Remedial Investigation; Naval Weapons Station Yorktown, Yorktown, Virginia; dated January, 2012. USEPA's comments on the report are provided below:

1. Page 35: The consensus decision indicates that surface water and sediment samples upstream, at, and downstream of the outfall discharge will be collected in order to "...reevaluate ecological risk associated with discharging volatile organic compounds (VOCs)." The executive summary update (page 6) indicates soil samples will be analyzed for VOC, SVOCs, explosives, metals and CN, the same as the initial RI. It appears that surface water and sediment samples would also need to be analyzed for this longer list of COPCs, not just VOCs. A more complete explanation about the COPCs that will be included in the analyses of all media needs to be provided. Finally, the surface water and sediment samples are not to be located in erosional areas.
2. Page 39: The text states "The area to the west of the industrial area slopes down to a ravine containing an intermittent stream that leads to Roosevelt Pond." The text also needs to clearly state why this drainage is not being addressed in this revised SAP.
3. Page 41: The text indicates there were no ecological screening level exceedances in site surface water or sediment. The text seems to suggest that this conclusion is based on data



collected prior to 2008. The revised SAP also needs to confirm that currently, there is no risk associated with COPCs other than VOCs.

4. The RI to be conducted also needs to include quantification of ecological risk from soils, surface water, and sediment.
5. Page 45: The fourth bullet identifies the site as being composed of buildings, pavement, and gravel. On page 32, the text states "...the site is entirely paved...." The text needs to consistently identify the surface features of this site. If the soil at the edge of the pavement has not been sampled for COPCs, then this needs to be included in the investigation.
6. Page 49: The text states "There are those instances where a laboratory limit of detection (LOD) for a specific constituent will be above its PAL. In those cases, an undetected value will be considered as the analyte not being present." The logic behind this approach needs to be clearly explained.
7. Figure 17 shows the proposed surface water and sediment sample locations. Three of the six sample locations do not appear to be in the intermittent drainage channel. Also, this does not appear to be consistent with the text where it indicates that one sample will be upstream of the outfall, one sample will be at the outfall and the rest will be downgradient of the outfall. This implies these samples will be in the intermittent drainage channel. Please clarify the location of these samples and the outfall, including where the outfall enters the intermittent channel.
8. In SAP Worksheets #15-8 through #15-16, risk-based screening levels for determining Contaminants of Potential Concern are provided. For soil, in addition to the direct contact screening levels provided in the tables, comparison to soil-to-groundwater migration values should also be performed. Many chemicals, primarily VOCs, have much higher direct contact screening levels than soil-to-groundwater migration values. In order to rule out soil as a continuing source of groundwater contamination, the latter comparison needs to be made.

If you have any questions, please contact me at (215) 814-3362 or via e-mail at oduwole.moshood@epa.gov.

Sincerely,

Moshood Oduwole, Remedial Project Manager
NPL/BRAC Federal Facilities Branch.

cc: Wade Smith, VADEQ

